

**FOX ROTHSCHILD LLP**

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Attorneys for Defendants

Mid-Atlantic Flooring Ventures, Inc., Aaron Bailey, and Mark Grossman

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

PAULINE BARTON,

Plaintiff,

vs.

MID-ATLANTIC FLOORING VENTURES,  
INC. d/b/a PROSOURCE OF SOUTH JERSEY  
AND PROSOURCE OF RARITAN CENTER,  
AARON BAILEY, MARK GROSSMAN,  
JOHN DOES, fictitious names of individuals of  
an unknown number, and ABC ENTITIES,  
fictitious names of corporations, partnerships,  
limited liability companies or other entities of  
an unknown number,

Defendants.

Civil Action No.: 1:13-cv-04592-RMB-AMD

Civil Action

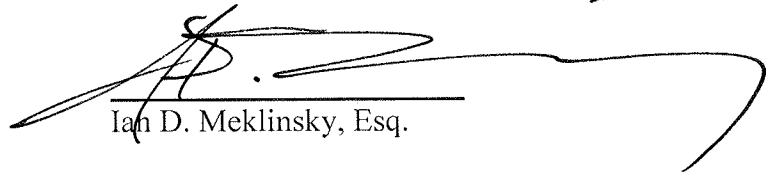
**OFFER OF JUDGMENT**

TO: Robert J. Hagerty, Esq.  
Hagerty Law, PC  
Moorestown Times Square  
714 E. Main Street  
Suite 2C  
Moorestown, NJ 08057

As provided for in Federal Rule of Civil Procedure 68, defendants, Mid-Atlantic Flooring Ventures, Inc. d/b/a/ ProSource of South Jersey and ProSource of Raritan Center, Aaron Bailey, and Mark Grossman (collectively "Defendants") hereby offer to allow judgment to be taken against them on all claims in the Complaint of plaintiff Pauline Barton for the total sum of eight

thousand dollars (\$8,000.00), inclusive of the costs of the action, and reasonable attorney's fees incurred through and including the date of the offer.

This Offer of Judgment is made for the purposes specified in Rule 68, and is not to be construed either as an admission that Defendants are liable in this matter, or that plaintiff Pauline Barton suffered any damages. If this Offer of Judgment is not accepted in writing within fourteen (14) days after it is served, it shall be deemed withdrawn.



Ian D. Meklinsky, Esq.

Dated: March 14, 2014

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing offer of judgment was served on this day via electronic mail and Federal Express upon the following individual:

Robert J. Hagerty, Esq.  
Hagerty Law, PC  
Moorestown Times Square  
714 E. Main Street  
Suite 2C  
Moorestown, NJ 08057



Deborah Furness

DATED: March 14, 2014